

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

VS.)

CARLOS FLETCHER,)

Case No: 3:11-cr-00083-15
JUDGE HAYNES

MOTION FOR EXCULPATORY EVIDENCE #2

ORDER
As provided by
local rule, this
motion is

Comes now the Defendant, Carlos Fletcher by and through counsel, Jim Todd, pursuant to Federal Rule of Criminal Procedure 16 and Brady v. Maryland, 373 U.S. 83 (1963) respectfully requests the Government to disclose any usage of GPS tracking devices including, but not limited to, GPS tracking devices placed on vehicles or utilized through cellular phones.

Defendant would submit that this information is potentially exculpatory pursuant to US v. Jones, 565 U. S. ____ (2012).

Respectfully submitted,

/s/ Jim Todd
JIM TODD #16320
HAGAN & TODD PLLC
218 Third Avenue North
Suite 200
Nashville, TN 37201
Phone: (615) 628-9111

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been transmitted via the Court's electronic filing system, and/or via United States mail, postage prepaid, to Assistant U. S. Attorney Brent Hannafan, 110 9th Ave., S. Suite A-961, Nashville, TN 37203 on this the 24th day of April, 2012.

/s/ Jim Todd
JIM TODD